

Federal Communications Commission

WASHINGTON, D.C.

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Amendment of Section 73.606(b)
Table of Allotments
Analog Television Broadcast Stations
(Tupelo, Mississippi)

)
)
)
)
)

MM Docket No. 00-____
RM-____

To: Chief, Video Services Division

PETITION FOR RULE MAKING

KB Prime Media LLC ("KB") and United Television, Inc. ("United"), the sole pending mutually exclusive applicants for a new NTSC facility on Channel 35, Tupelo, Mississippi, hereby jointly request that the Commission initiate a rule making proceeding to substitute and allot NTSC Channel 49 for its proposed NTSC Channel 35 at Tupelo, Mississippi at reference coordinates 33-55-37 N. and 88-33-36 W.¹

As set forth in the Engineering Statement, (attached hereto as Exhibit A), operation on Channel 49 appears permissible with an effective radiated power ("ERP") of up to 5000 kW,

¹On November 22, 1999, the Commission opened a filing window to allow applicants for new NTSC stations to modify their proposals to eliminate potential digital television (DTV) conflicts, which was scheduled to close on March 17, 2000. See Public Notice, DA 99-2605 (released November 22, 1999). The Commission later extended the filing window until July 15, 2000. See Public Notice, DA 00-536 (released March 9, 2000). Thus, this rule making is timely filed.

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utilizing a directional antenna and an antenna height above average terrain (HAAT) of 219 meters. Thus, KB and United request the following change to the NTSC Table of Allotments:

	<u>Current</u>	<u>Proposed</u>
Tupelo, Mississippi	9, 35	9, 49

DISCUSSION

Pursuant to the Commission's Public Notice, DA 99-2605 (released November 22, 1999), mutually exclusive applicants for a single NTSC allotment located in the freeze area are eligible to propose a substitute channel by way of a rule making in this filing window. However, the Commission requires that the applicants demonstrate that interference would be caused to a DTV facility should the requested channel change not be made. Both KB's and United's pending applications propose operation within the freeze area and thus, they are eligible to file the instant rule making. Operation on Channel 49 would eliminate any such interference, and would allow the parties to pursue ongoing efforts to introduce a new local television service to the Tupelo community.

Additionally and in accordance with the Public Notice, the proposed operation on Channel 49 complies with the Commission's minimum separation requirements specified in Section 73.610 and the DTV interference criterion specified in Section 73.623(c) of the Commission's rules. Moreover, such proposal does not adversely impact any low power television stations which filed for Class A eligibility. See Exhibit B.

If the proposal set forth herein is adopted, the parties agree to amend their applications to specify operation on Channel 49.

CONCLUSION

For the foregoing reasons, KB and United jointly request that the Commission initiate the rule making requested herein and that it substitute NTSC Channel 49 for NTSC Channel 35 at Tupelo, Mississippi with an ERP of up to 5000 kW and an HAAT of 219 meters.

Respectfully submitted,

KB PRIME MEDIA LLC

By: *Lara S. Meisner*
David D. Oxenford
Lara S. Meisner
Its Attorneys

SHAW PITTMAN
2300 N Street, N.W.
Washington, D.C. 20037-1128
(202) 663-8000

UNITED TELEVISION, INC.

By: *Marvin J. Diamond / JSD*
Marvin J. Diamond

Law Offices of Marvin J. Diamond
PMB 365
464 Common Street
Belmont, MA 02478
(617) 484-4171

Its Attorney

Dated: July 13, 2000

EXHIBIT A

TECHNICAL EXHIBIT
PREPARED IN SUPPORT OF
PETITION FOR RULE MAKING TO
MODIFY THE NTSC ALLOTMENT TABLE
TUPELO, MISSISSIPPI

Technical Narrative

This technical narrative and associated exhibits have been prepared on behalf of KB Prime Media LLC (KB), in support of a Petition for Rule Making to modify the NTSC allotment at Tupelo, Mississippi by the proposed substitution of channel 49 for channel 35.

In the Public Notice, "Mass Media Bureau Announces Window Filing Opportunity for Certain Pending Applications and Allotment Petitions for New Analog TV Stations", released on November 22, 1999, the FCC announced a filing window opportunity for applicants with certain pending application and allotment petitions for new analog TV stations. Specifically, applicants with pending applications for new full-service NTSC television stations on channels 2-59 at locations inside of the "TV Freeze Areas" are eligible for the filing window.

Currently, KB has a pending application (BPCT-960920LX) for operation on NTSC channel 35 from a site located within a "TV Freeze Area", and is therefore considered eligible for the filing window. The pending KB application proposes operation on TV channel 35 with a non-directional effective radiated power (ERP) of 5000 kilowatts and an HAAT of 219 meters. However, when the FCC allotted channel 35 for the DTV operation of WCBI-TV at

Columbus, Mississippi, the possible use of channel 35 at Tupelo was eliminated. Therefore, this petition for rulemaking proposes to substitute NTSC channel 49 for the channel 35 NTSC allotment at Tupelo.

NTSC channel 49 can be substituted and allotted to Tupelo, Mississippi in compliance with the principle community coverage requirements of section 73.685(a) at the following reference coordinates, Latitude 33° 55' 37", Longitude 88° 33' 36".¹ Operation on channel 49 from the proposed site appears permissible with a directional maximum effective radiated power (ERP) of 5000 kilowatts and an HAAT of 219 meters. It is noted that a directional operation is proposed in order to provide the necessary protection toward co-channel DTV station WAFF-DT at Huntsville, Alabama.

The proposed transmitter site would meet the Commission's minimum separation requirements to analog (NTSC) allotments specified in Section 73.610. The proposed channel 49 operation also complies with the FCC's interference criterion with respect to DTV allotments and authorized DTV facilities provided in Section 73.623(c). Therefore, it is proposed to modify the NTSC allotment at Tupelo with the following specifications:

State & City	NTSC Channel	NTSC ERP (kW)	Antenna HAAT (m)
MS, Tupelo	49	5000 (DA)	219

It is proposed to amend the NTSC Table of Allotments, Section 73.606(b) of the Commission's Rules, as follows:

<u>City</u>	<u>Channel No.</u>	
	<u>Present</u>	<u>Proposed</u>
Tupelo, Mississippi	9, 35	9, 49

It is proposed to allot UHF channel 49 at Latitude 33° 55' 37", Longitude 88° 33' 36". The channel 49 facility proposes operation with an antenna radiation center height above mean sea level (RCAMSL) of 292 meters, an antenna radiation center height above average terrain of 219 meters, and a directional antenna maximum ERP of 5000 kilowatts. The directional operation proposes the use of an Andrew ATW-C4 "cardioid" type antenna.

Figure 1 is a separation study toward other NTSC and DTV allotments based on a 161 kilometer "buffer". As indicated, the allotment reference point is fully-spaced to all other NTSC station's or allotments. With respect to DTV allotments, the separation requirements can be used as an indication of which DTV stations have the potential of receiving interference from the proposed channel 49 NTSC operation.

Figure 2 provides a polar graph and tabulation of the horizontal plane relative field pattern for the proposed Andrew ATW-C4 "cardioid" directional antenna.

Figure 3 provides a summary of interference and service for the proposed channel 49 NTSC allotment. Determination of interference was made in accordance with the procedures adopted in the FCC's Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket No. 87-268 and outlined in

¹ The reference coordinates are also the proposed transmitter site coordinates specified in KB Communications Corporation's pending application, BPCT-960920LX.

OET Bulletin No. 69.² Studies indicated that the proposed channel 49 operation would not cause prohibited interference to any DTV allotments, and therefore the proposed operation is in full compliance with the FCC's interference criterion with respect to pertinent DTV allotments.

Figure 4 is a map which depicts the City Grade (80 dBu), Grade A (74 dBu), and Grade B (64 dBu) contours for the proposed channel 49 NTSC operation. The city limits of Tupelo based on the 1990 Census data, are also shown. As indicated, all of Tupelo is located within the predicted City Grade contour. Therefore, the proposed channel 49 NTSC allotment will comply with the FCC's city coverage requirements.

Conclusion

Channel 49 can be substituted for the current channel 35 NTSC allotment at Tupelo, in compliance with the FCC rules concerning NTSC allotment changes.


Jerome J. Manarchuck

du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, Florida 34237

January 25, 2000

² The du Treil, Lundin & Rackley, Inc. DTV interference analysis program is based on the program and procedures outlined by the FCC in the Sixth Report and Order; subsequent Memorandum Opinion and Order; and FCC OET Bulletin No. 69. A nominal grid size resolution of 2 km was employed. An Alpha based processor computer system was employed. The results have been found to be in very close agreement with the results of the FCC implementation of OET Bulletin No. 69.

TV - TV Separation Study

Job Title : Proposed Ch. 49
Zone : 2
Channel 49 (680-686 MHz)

Separation Buffer 161 km
FCC TV DB Date : 12/30/99
Coordinates : 33-55-37 88-33-36

Call Status	City St	FCC File No.	Channel Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear. True	Dist. (km)	Req. (km)
ALLOC.	MS	-	SENATOBIA *34(-) II	0	34-37-02 89-58-03	301.1 30.66	150.56	119.9 CLEAR
NEW APP	MS	BPET-961001KI	SENATOBIA *34(-) II	1100 195	34-41-42 89-56-13	304.4 32.83	152.73	119.9 CLEAR
NEW APP	MS	BPET-960724KL	SENATOBIA *34(-) II	5000 DA 195	34-50-57 90-00-33	308.0 48.12	168.02	119.9 CLEAR
NEW APP	MS	BPET-960923KG	SENATOBIA *34(-) II	5000 DA 194	34-50-57 90-00-39	308.0 48.24	168.14	119.9 CLEAR
NEW APP	MS	BPET-960716KF	SENATOBIA *34(-) II	138 195	34-50-57 90-00-39	308.0 48.24	168.14	119.9 CLEAR
NEW APP	MS	BPET-960701KF	SENATOBIA *34(-) II	77.6 66	34-41-46 90-11-21	300.2 52.64	172.54	119.9 CLEAR
ALLOC.	MS	-	MAGEE 34(+) III	0	31-52-18 89-43-54	205.9 133.03	252.93	119.9 CLEAR
NEW APP	MS	BPCT-960920LS	MAGEE 34(+) III	1510 98	31-49-30 89-51-35	207.8 143.04	262.94	119.9 CLEAR
REQUESTS A WAIVER OF FREEZE.								
NEW APP	MS	BPCT-960920LX	TUPELO 35(+) II	5000 219	33-55-37 88-33-36	0.0 0.00	0.00	95.7 ¹
REQUESTS A WAIVER OF FREEZE.								
ALLOC.	MS	-	TUPELO 35(+) II	0	34-15-42 88-42-48	339.3 -55.96	39.74	95.7 ¹ SHORT
EFFECTIVE 9-18-84								
NEW APP	MS	BPCT-960920IU	TUPELO 35(+) II	5000 257	34-23-52 88-53-03	330.4 -35.51	60.19	95.7 ¹ SHORT
REQUESTS A WAIVER OF FREEZE								
WIIQ LIC	AL	BLET-960221KE	DEMOPOLIS *41(o) III	1950 DA 333	32-22-01 87-52-03	159.4 153.29	184.69	31.4 CLEAR

¹ The channel 35 NTSC allotment will be displaced by the allotment of DTV channel 35 to station WCBI-TV, Ch. 4 at Columbus, Mississippi. This petition proposes the substitution of channel 49 for the channel 35 allotment.

TV - TV Separation Study

Job Title : Proposed Ch. 49

Separation Buffer 161 km

Zone : 2

FCC TV DB Date : 12/30/99

Channel 49 (680-686 MHz)

Coordinates : 33-55-37 88-33-36

Call Status	City St	FCC File No.	Channel Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear. True	Dist. (km)	Req. (km)
WIAT LIC	BIRMINGHAM AL		42(+) II	5000 421	33-29-02 86-48-21	106.4	169.89 74.19	95.7 CLEAR
		BLCT-961001UP						
WKDH CP	HOUSTON MS		45(+) II	5000 506	33-47-40 89-05-16	253.3	51.01 19.61	31.4 CLEAR
		BPCT-960827KE						
WAFF LIC	HUNTSVILLE AL		48(-) II	1170 579	34-42-39 86-32-07	64.3	205.65 117.95	87.7 CLEAR
		BLCT-800724KI						
ALLOC.	CARROLLTON GA	-	*49(-) II	0	33-34-48 85-04-36	95.9	325.04 44.24	280.8 CLEAR
WDKA LIC	PADUCAH KY		49(o) II	2450 DA 327	37-23-42 88-56-23	355.0	386.31 105.51	280.8 CLEAR
		BLCT-970616KF						
KKYKTV CP	CAMDEN AR		49(-) II	1510 175	33-16-19 92-42-11	260.4	391.35 110.55	280.8 CLEAR
		BPCT-970331LJ						
ADD	CAMDEN AR	-	49(-) II	1510 175	33-16-19 92-42-11	260.4	391.35 110.55	280.8 CLEAR
		PETITIONER REQUESTS CHANGE OF COMMUNITY FROM EL DORADO, AR						
KKYKTV APP	CAMDEN AR		49(-) II	3020 175	33-16-19 92-42-12	260.4	391.38 110.58	280.8 CLEAR
		BPCT-991208BG						
WPXXTV LIC	MEMPHIS TN		50(o) II	1320 315	35-12-41 89-48-54	321.5	183.22 95.52	87.7 CLEAR
		BLCT-950315KH						
ADD	CENTER POINT AL	-	51(+) II	0	33-05-51 86-53-38	120.4	180.08 148.68	31.4 CLEAR
		SITE RESTRICTION 62.9KM SOUTH.						
NEW APP	JACKSON MS		51(o) II	5000 559	32-41-25 89-52-06	221.8	183.47 152.07	31.4 CLEAR
		BPCT-961001UU						
		REQUESTS A WAIVER OF FREEZE						
NEW APP	JACKSON MS		51(o) II	5000 554	32-41-25 89-52-06	221.8	183.47 152.07	31.4 CLEAR
		BPCT-960710KY						

TV - TV Separation Study

Job Title : Proposed Ch. 49

Separation Buffer 161 km

Zone : 2

FCC TV DB Date : 12/30/99

Channel 49 (680-686 MHz)

Coordinates : 33-55-37 88-33-36

Call Status	City St	FCC File No.	Channel Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear. True	Dist. (km)	Req. (km)
NEW	TUSCUMBIA		52(+)	1510	34-40-46	35.3	102.73	31.4
APP	AL	BPCT-960920LN	II	126	87-54-35		71.33	CLEAR
REQUESTS A WAIVER OF FREEZE.								
ALLOC.	AL	-	II	0	34-43-54 87-41-54	41.2	119.41 88.01	31.4 CLEAR
ALLOC.	AL	-	II	0	34-36-12 86-58-42	62.2	163.87 132.47	31.4 CLEAR
ALLOCATION USED HUNTSVILLE, AL.								
NEW	MEMPHIS		*56(o)	3020	35-09-14	320.1	178.72	95.7
APP	TN	BPET-961213KH	II	332	89-49-18		83.02	CLEAR
NEW	MEMPHIS		*56(o)	1950	35-09-17	320.1	178.83	95.7
APP	TN	BPET-961212KH	II	283	89-49-20		83.13	CLEAR
NEW	MEMPHIS		*56(o)	1170	35-12-41	321.5	183.22	95.7
APP	TN	BPET-961118KJ	II	296	89-48-54		87.52	CLEAR
NEW	MEMPHIS		*56(o)	407. DA	35-12-41	321.5	183.22	95.7
APP	TN	BPET-961211KE	II	270	89-48-54		87.52	CLEAR
ALLOC.	TN	-	II	0	35-08-58 90-02-56	315.3	192.55 96.85	95.7 CLEAR
EFFECTIVE 11-12-96.								
ALLOC.	AL	-	II	0	34-19-00 86-29-42	76.6	195.36 99.66	95.7 CLEAR
EFFECTIVE 07-18-86								
NEW	ARAB		56(-)	5000	34-21-03	75.8	201.10	95.7
APP	AL	BPCT-960722KS	II	504	86-26-25		105.40	CLEAR
REQUESTS A WAIVER OF FREEZE								
NEW	MEMPHIS		*56(o)	5000 DA	35-28-03	319.4	227.02	95.7
APP	TN	BPET-961211KK	II	356	90-11-27		131.32	CLEAR
NEW	MEMPHIS		*56(o)	4470 DA	35-28-03	319.4	227.02	95.7
APP	TN	BPET-970331LE	II	379	90-11-27		131.32	CLEAR
ALLOC.	TN	-	II	0	35-27-11 86-08-20	51.8	279.08 159.18	119.9 CLEAR

TV - DTV Separation Study

Job Title : Proposed Ch. 49
Zone : 2
Channel 49 (680-686 MHz)

Separation Buffer 161 km
FCC DTV DB Date: 12/18/98
Coordinates : 33-55-37 88-33-36

Call Status	City St	FCC File No.	Channel Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear. True	Dist. (km)	Req. (km)
DWTOKTV	MERIDIAN		49	1000	32-19-38	184.0	177.84	244.6
DTVALT	MS		III	165	88-41-28		-66.76	SHORT
DWAFF	HUNTSVILLE		49	50	34-42-39	64.3	205.64	244.6
DTVALT	AL		II	579	86-32-07		-38.96	SHORT
DKVTJ	JONESBORO		49	57.2	35-53-27	316.3	305.39	244.6
DTVALT	AR		II	305	90-54-06		60.79	CLEAR
DWXTX	COLUMBUS		49	50	32-27-40	114.4	379.84	244.6
DTVALT	GA		II	345	84-52-43		135.24	CLEAR
DWNTZ	NATCHEZ		49	82.2	31-40-08	230.2	385.68	244.6
DTVALT	MS		III	316	91-41-30		141.08	CLEAR
WTOK-DT	MERIDIAN		49	175	32-19-38	184.0	177.85	280.8
APP	MS	BPCDT-991028DD	III	165	88-41-28		-102.95	SHORT
DIGITAL TV; ERP AS SHOWN ON APP.								
WAFF-DT	HUNTSVILLE		49	50 DA	34-42-39	64.3	205.65	280.8
APP	AL	BPCDT-991028DA	II	571	86-32-07		-75.15	SHORT
DIGITAL TV; ERP AS SHOWN ON APP.								
KVTJ-DT	JONESBORO		49	57 DA	35-36-16	316.7	258.63	280.8
APP	AR	BPCDT-990930AS	II	295	90-31-18		-22.17	SHORT
DIGITAL TV; ERP AS SHOWN ON APPLICATION								
WXTX-DT	COLUMBUS		49	1000 DA	32-27-40	114.4	379.84	280.8
APP	GA	BPCDT-991027CY	II	319	84-52-43		99.04	CLEAR
DIGITAL TV								
WNTZ-DT	NATCHEZ		49	1000 DA	31-40-08	230.2	385.68	280.8
APP	MS	BPCDT-991027BM	III	313	91-41-30		104.88	CLEAR
DIGITAL TV								
WAWD-DT	FORT WALTON BEACH		49	40 DA	30-23-49	153.2	436.69	280.8
APP	FL	BPCDT-991105AL	III	56	86-30-27		155.89	CLEAR
DIGITAL TV; ERP AS SHOWN ON APPLICATION								
DWBRCTV	BIRMINGHAM		50	1000	33-29-19	106.2	170.29	12.0/106.0
DTVALT	AL		II	420	86-47-58		64.29	CLEAR
WBRC-DT	BIRMINGHAM		50	1000	33-29-19	106.2	170.30	87.7
CP	AL	BPCDT-991004BM	II	373	86-47-58		82.60	CLEAR
DIGITAL TV								



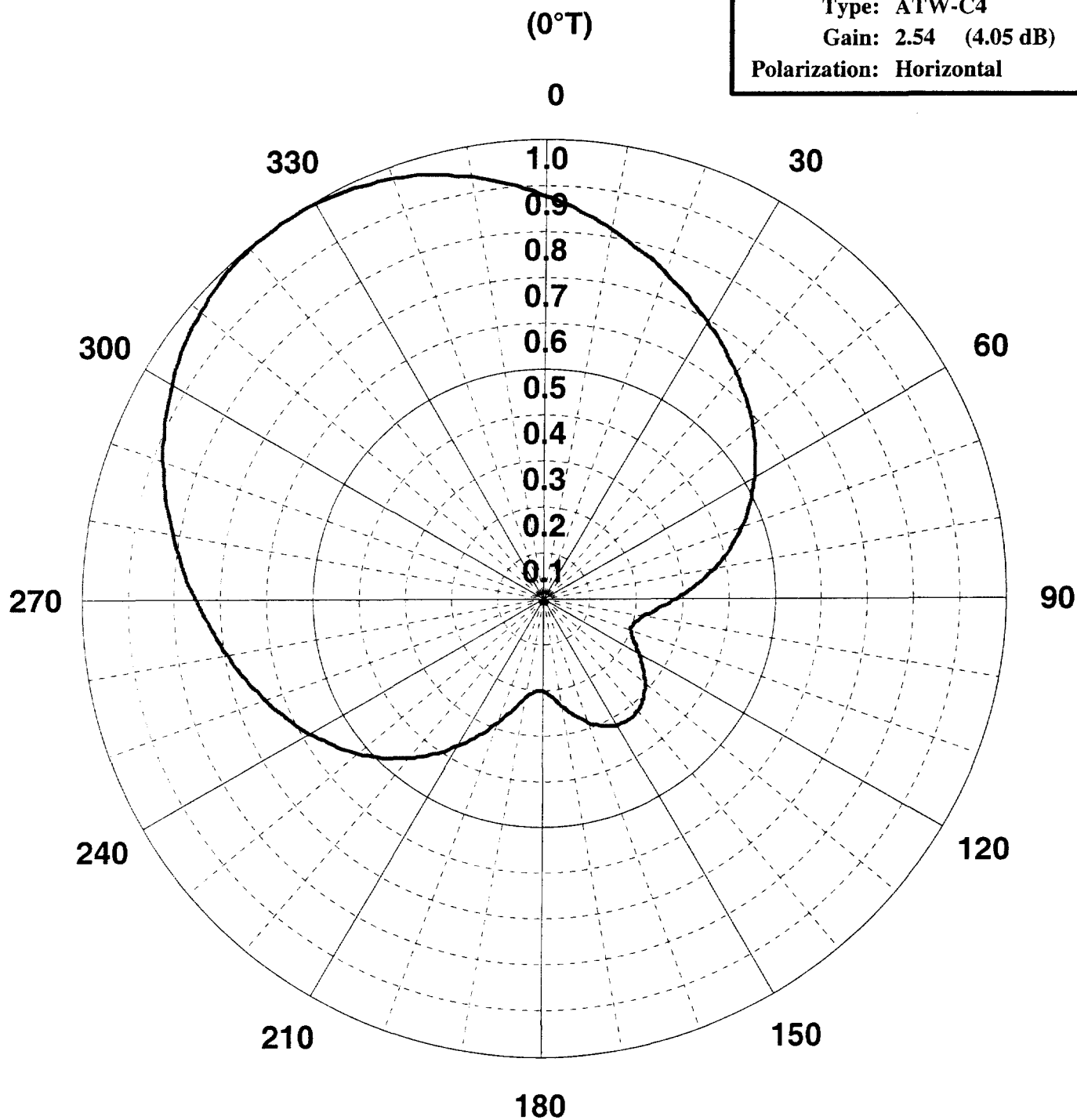
ANDREW

Channel: 29

Type: ATW-C4

Gain: 2.54 (4.05 dB)

Polarization: Horizontal



ANDREW CORPORATION
10500 W. 153rd Street
Orland Park, Illinois U.S.A. 60462

Company:
Site:
Proposal Number:

Date: 1/20/00
Author: JJM

TECHNICAL EXHIBIT
PREPARED IN SUPPORT OF
PETITION FOR RULE MAKING TO
MODIFY THE NTSC ALLOTMENT TABLE
TUPELO, MISSISSIPPI

Tabulation of Horizontal Relative Fields

Azimuth (deg. True)	Relative Field	Azimuth (deg. True)	Relative Field
0	0.878	180	0.199
10	0.816	190	0.217
20	0.754	200	0.286
30	0.695	210	0.371
40	0.639	220	0.452
50	0.584	230	0.523
60	0.523	240	0.584
70	0.452	250	0.639
80	0.371	260	0.695
90	0.286	270	0.754
100	0.217	280	0.816
110	0.199	290	0.878
120	0.237	300	0.933
130	0.287	310	0.975
140	0.318	320	0.997
150	0.318	330	0.997
160	0.287	340	0.975
170	0.237	350	0.933

Extra Bearing(s)			
325	1.000		

Figure 3

TECHNICAL EXHIBIT
PREPARED IN SUPPORT OF
PETITION FOR RULE MAKING TO
MODIFY THE NTSC ALLOTMENT TABLE
TUPELO, MISSISSIPPI

Interference and Service Summary

I. Interference Caused

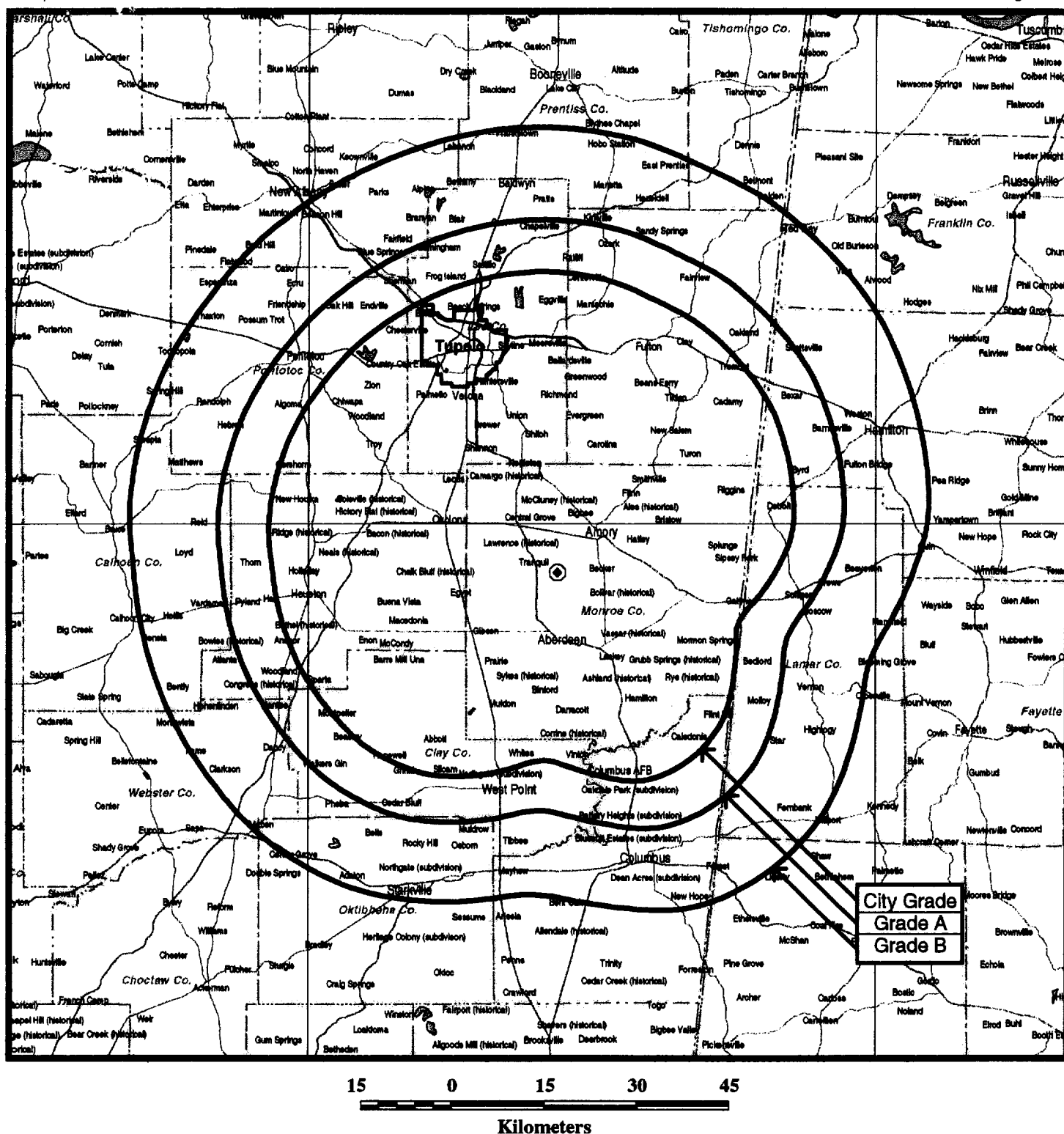
Protected DTV Station	FCC Service Population	Interference Population	Unique Interference Population*
WTOK-DT, DTV Ch. 49 Meridian, MS (App.)	198,835	657 (0.33%)	
DWTOKTV, DTV Ch. 49 Meridian, MS (Alt.)	290,000	1,179 (0.41%)	
WAFF-DT, DTV Ch. 49 Huntsville, AL (App.)	795,147	3,700 (0.47%)	3,385 (0.43%)
DWAFF, DTV Ch. 49 Huntsville, AL (Alt.)	816,000	2,192 (0.27%)	
KVTJ-DT, DTV Ch. 49 Jonesboro, AR (App.)	674,932	932 (0.14%)	
DKVTJ, DTV Ch. 49 Jonesboro, AR (Alt.)	256,000	318 (0.12%)	

*Considers interference "masking" from other NTSC and DTV assignments.

II. Service

	Population
Grade B Contour	314,148

Figure 4



FCC PREDICTED COVERAGE

STATION NEW(TV)
TUPELO, MISSISSIPPI
CH 49 5000 KW (MAX-DA) 219 M

du Treil, Lundin & Rackley, Inc. Sarasota, FL

EXHIBIT B

TECHNICAL EXHIBIT
SUPPLEMENT TO THE
PETITION FOR RULE MAKING TO
MODIFY THE NTSC ALLOTMENT TABLE
STATION NEW(TV)
TUPELO, MISSISSIPPI

Technical Narrative

This technical exhibit has been prepared on behalf of KB Prime Media LLC as a "supplement" to the Petition for Rule Making to modify the NTSC allotment at Tupelo, Mississippi by the proposed substitution of channel 49 for channel 35. The purpose is to demonstrate that the proposal will not adversely impact any LPTV stations which filed for Class A eligibility.

Figure 1A is a tabulation of all co-channel and adjacent channel LPTV stations which filed for Class A eligibility and which could be adversely impacted by the proposed channel 49 NTSC operation. Studies indicate the proposed operation on NTSC channel 49 at Tupelo will not adversely impact any of the co-channel or pertinent adjacent channel LPTV stations tabulated on Figure 1A.



W. Jeffrey Reynolds

du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, Florida 34237

July 12, 2000

Potentially Impacted Class A LPTV Stations

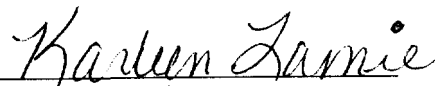
Call Status	City State	FCC File No.	Channel Zone	ERP(kw) HAAT(m)	Latitude Longitude	Bearing deg-True	Distance (km) (mile)
W49AY LIC	BIRMINGHAM AL	BLTTL-920218JN	49(o)	.97 209 max.	33-29-02 86-48-35	106.44	169.54 105.37
WDGA-LP APP	DALTON GA	BPTTL-980601NC	49(+) II	10.4 DA 363 max.	34-44-00 85-01-03	73.59	338.06 210.10

FROM CH. 47; CALL SIGN CHANGED FROM W47BA EFF. 07-01-98.

CERTIFICATE OF SERVICE

I, Karleen Lamie, a secretary in the law firm of Shaw Pittman, hereby certify that on this 13 th day of July, 2000, I caused to be served by hand delivery a copy of the foregoing "**Petition for Rule Making,**" on the following:

John A. Karousos, Chief
Allocations Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
445 12th Street, SW
3-A320
Washington, DC 20554


Karleen Lamie